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VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: *Business Data Services in an Internet Protocol Environment et al., WC
Docket Nos. 16-143, 15-247, and 05-25 and RM-10593*

Dear Ms. Dortch:

On October 31, 2016, Jeff Lanning and Melissa Newman for CenturyLink and Kathleen Abernathy, and I for Frontier Communications, along with outside counsel Bryan Tramont of Wilkinson Barker Knauer LLP, met with the following members of the Wireline Competition Bureau: Matt DelNero, Chief; Deena Shetler, Associate Bureau Chief; Eric Ralph, Chief Economist; Thom Parisi, Legal Advisor; Pam Arluk, Pricing Policy Division Chief; David Zesinger, Pricing Policy Deputy Division Chief; and William Kehoe, Pricing Policy Assistant Division Chief, to discuss the proceeding referenced above.

CenturyLink and Frontier (Parties) explained the ways in which the draft BDS proposal would unduly affect mid-size ILECs, like CenturyLink and Frontier, in ways that would be deeply harmful to investment in American broadband connectivity and jobs. The Parties also stated the importance of ensuring that the Commission carefully consider the current state of market competition in how it implements any reform to existing grants of Phase II pricing flexibility, noting the particularly competitive nature of the transport market. The Parties' discussion on the topic of Phase II pricing flexibility and transport was consistent with the recent filings of CenturyLink and AT&T on the same topic, including an emphasis on the undeveloped nature of these topics on the record.¹

Please contact me with any questions.

Sincerely,

_____/s/____

Mike Saperstein

cc: Meeting Participants

¹ See Letter from Russell P. Hanser, Counsel to CenturyLink Inc., to Marlene H. Dortch, Secretary, FCC, WC Dkt. Nos. 16-143, 15-247, 05-25, RM-10593 at 1-2 (Oct. 28, 2016); Letter from James P. Young, Counsel to AT&T Inc., to Marlene H. Dortch, Secretary, FCC, WC Dkt. Nos. 16-143, 15-247, 05-25, RM-10593 at 4-11 (Oct. 28, 2016)